

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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DENISE PAYNE,

Plaintiff,

v.

CORNELL UNIVERSITY,

Defendant.

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**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

Civil Action No. 18-cv-1442 (GTS/ML)

PLEASE TAKE NOTICE that on April 2, 2020 at 10:00 a.m. at the United States District Court for the Northern District of New York, United States Courthouse, 100 South Clinton Street, Syracuse, New York, Defendant Cornell University (“Cornell”) will move, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for an order granting summary judgment as a matter of law and dismissing the complaint in its entirety against Cornell, and directing the Clerk of the Court to enter judgment in its favor.

This motion pursuant to Rule 56 is made on the grounds that the undisputed material facts revealed through the record evidence do not support any claim of disparate treatment, hostile work environment, failure to accommodate, or retaliation, and therefore, there is no basis in law to hold Cornell liable to plaintiff for any cause of action pled in her complaint. Summary judgment should be granted as a matter of law dismissing all claims alleged against Cornell.

This motion is based on the Statement of Material Facts, dated March 2, 2020, Exhibits A-YY thereto, and the arguments contained in the Memorandum of Law submitted herewith.

Dated: March 2, 2020

/s/ Adam G. Pence  
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